

CERTIFICATION OF CPNI FILING FEBRUARY 6, 2006
EB-06-TC-060
EB Docket No. 06-36

Company Name(s): **Waitsfield-Fayston Telephone Co., Inc.**
 d/b/a Waitsfield & Champlain Valley Telecom
 PO Box 9
 Waitsfield, VT 05673

Green Mountain Long Distance Service, Inc.
 PO Box 9
 Waitsfield, VT 05673

I am a corporate officer of Waitsfield-Fayston Telephone Co., Inc. and Green Mountain Long Distance Service, Inc. (Companies). I hereby certify that I have personal knowledge that the Companies have established operating procedures that are adequate to ensure compliance with the FCC's rules concerning customer proprietary network information (CPNI), as contained in 47 C.F.R. §§ 64.2001 et seq.

Attached to this Certificate is a Statement describing the procedures used by the Companies to ensure compliance with the CPNI rules.

I hereby certify that the information contained in this Certificate and the attached Statement are accurate and complete to the best of my ability.

Name (signature): 

Name (printed): Roger Nishi

Title: Vice President - Industry Relations

Date: February 2, 2006

STATEMENT CONCERNING CPNI PROCEDURES

- 1. To ensure compliance with Section 64.2005 of the FCC's CPNI rules, concerning the use of CPNI without customer approval, the Company employs the following procedures.**

Waitsfield-Fayston Telephone Co., Inc. (WCVT) and Green Mountain Long Distance Service, Inc. (GMLD) occasionally market services to our customers using CPNI in situations that do not require customer approval. For example, WCVT markets calling features to current local customers and GMLD markets long distance calling plans to its current customers.

- 2. To ensure compliance with Sections 64.2007 and 64.2008 of the FCC's CPNI rules, concerning the use of CPNI with customer approval and the corresponding notices, the Company employs the following procedures.**

Our companies occasionally use oral notice to obtain limited, one-time use of CPNI for customer telephone contacts for the duration of a call, in accordance with the CPNI rules. Our companies do not otherwise make use of CPNI in a way that requires notice and approval.

- 3. To ensure compliance with Section 64.2009 of the FCC's CPNI rules, concerning the safeguards for the use of CPNI, the Company employs the following procedures.**

As described above, CPNI is used only in limited instances, and in those instances, customer notice and approval is required before access is made to a customer's CPNI. Our companies provide periodic training sessions to our personnel to ensure they are aware of when they are and are not authorized to use CPNI. Our companies have an express disciplinary process in place to handle any instances where improper use is made of CPNI; the process is described in our employee manuals. Our companies maintain records of marketing campaigns, although we do not use CPNI for marketing campaigns. We have a supervisory review process regarding compliance with the CPNI rules; we retain records of compliance as required by the rules; and sales personnel obtain supervisory approval of proposed requests for the use of CPNI.